

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KAUSHIK MAHIDA, individually, and)	
on Behalf of All Others Similarly Situated,)	
)	
<i>Plaintiff,</i>)	No. 1:22-cv-02273
v.)	
)	Honorable Sara L. Ellis
ILLINOIS GASTROENTEROLOGY)	
GROUP, PLLC,)	Magistrate Judge Sheila M. Finnegan
<i>Defendant.</i>)	

**JOINT MOTION TO TEMPORARILY STAY
PROCEEDINGS TO ALLOW FOR MEDIATION**

Plaintiff Kaushik Mahida and Defendant Illinois Gastroenterology Group, P.L.L.C., (“IGG”) by their respective counsel, jointly move for a temporary stay of these proceedings to allow the parties the opportunity to mediate this and seven other related data breach lawsuits in a global mediation scheduled for September 20, 2022. In support of this motion, the parties further state as follows:

1. On May 2, 2022, plaintiff filed his Complaint against IGG alleging a data breach within IGG’s network. (Dkt. 1). Plaintiff has brought this action on behalf of himself and a putative class. (Id.).
2. On June 27, 2022, this Court granted IGG’s second motion for an extension of time to respond to plaintiff’s Complaint to and including July 25, 2022. (Dkt. 11). The Court also set the matter for status on July 27, 2022 at 9:30 a.m. and ordered the parties to submit a joint status report by July 20, 2022. (Id.).
3. As discussed in IGG’s last motion for an extension, counsel for IGG and the plaintiff have been discussing the possibility of an early mediation of this dispute. (Dkt. 9).

4. Further, this case is one of eight data breach cases filed against IGG in a number of different Illinois courts. In addition to this case, these cases are:

- *Doe v. Illinois Gastroenterology Group, No. 22 CH 4408 (Cook Co.) – Filed 5/9/22*
- *McNicholas v. Illinois Gastroenterology Group, No. 22 L 173 (Lake Co.) – Filed 5/11/22*
- *McMillon v. Illinois Gastroenterology Group, No. 22-cv-2539 (N.D. Ill.) – Filed 5/13/22*
- *Doe v. Illinois Gastroenterology Group, No. 22 CH 4665 (Cook Co.) – Filed 5/16/22*
- *Fliman v. Illinois Gastroenterology Group, No. 22 CH 4706 (Cook Co.) – Filed 5/17/22*
- *Whitehead v. Illinois Gastroenterology Group, No. 22 LA 202 (Lake Co.) – Filed 5/27/22*
- *Castillo v. Illinois Gastroenterology Group, No. 22-cv-02953 (N.D. Ill.) – Filed 6/6/22*

5. Although coordination between multiple sets of attorneys in all of the above cases has taken some time, counsel for the parties in this case, as well as counsel in the seven additional cases above, have agreed to participate in a global mediation set for September 20, 2022 to attempt a resolution of these pending matters.

6. The parties wish to conserve resources and refrain from additional expense in this matter while they prepare for and conduct the mediation and continue settlement discussions. As a result, they respectfully request that all deadlines in this case be suspended and the case be temporarily stayed until after the global mediation on September 20, 2022 has been completed.

7. Similar motions to stay such as this one have been, or are about to be, filed in the other data breach cases listed above. One of the first motions filed in the *McMillon* matter (N.D. Ill. No. 22-cv-2539) was recently granted this week.

WHEREFORE, Plaintiff Kaushik Mahida and Defendant Illinois Gastroenterology Group, P.L.L.C. respectfully request entry of an Order suspending all current deadlines and temporarily staying these proceedings until after the global mediation of this and other related cases on September 20, 2022 has been completed.

Respectfully submitted,

/s/ Carl V. Malmstrom

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the **Joint Motion to Temporarily Stay Proceedings to Allow for Mediation** was filed electronically this **15th** day of **July, 2022**. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic system.

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